

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION**

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	No. 4:14-CR-246 AGF/NAB
v.)	
)	
THOMAS ANDERSON, JR.)	
)	
Defendant.)	

MOTION TO CONTINUE SENTENCING HEARING

Defendant Thomas Gregory Anderson, Jr. (“Anderson”), by and through his counsel, Justin K. Gelfand and William Margulis and their law firm, Capes, Sokol, Goodman & Sarachan, P.C., respectfully requests that this Court continue the sentencing hearing in this case to a date in late December 2017 or in January 2018 that is convenient for the Court and the parties.

Anderson is scheduled to be sentenced on November 21, 2017 at 9:30 a.m. (Doc. 998.) Anderson’s counsel would benefit from additional time to pursue certain leads relevant to sentencing including, but not limited to, issues that have arisen with the disclosure of the draft Presentence Investigation Report by the U.S. Probation Office. Anderson has also requested that undersigned counsel file a motion to compel discovery—which is being filed contemporaneously with this motion—and resolution of that issue is necessary so as to preserve all issues potentially relevant to an appeal in this case following sentencing.

Anderson submits that this brief continuance of sentencing does not prejudice the Government as Anderson is currently in custody and faces a mandatory minimum sentence in this case.

Accordingly, Anderson respectfully requests that this Court continue sentencing to a date convenient to the Court and the parties in late December 2017 or in January 2018.

Respectfully submitted,

/s/ JUSTIN K. GELFAND

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Certificate of Service

I hereby certify that I filed the foregoing through the Court's CM/ECF system which will provide notice of filing to all counsel of record.

/s/ JUSTIN K. GELFAND

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